

**ORIGINAL**

**FILED**  
DISTRICT COURT OF GUAM

JAN 23 2008

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Clerk of Court

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IN THE UNITED STATES DISTRICT COURT  
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,

Plaintiff,

vs.

YOUNG MIN KO,

Defendant.

CRIMINAL CASE NO. 06-00092

**SUPERSEDING INDICTMENT**

**CRIMINAL CONSPIRACY**

[18 U.S.C. §§ 2 & 371]

**FRAUD IN CONNECTION WITH  
IDENTIFICATION DOCUMENTS**

[18 U.S.C. §§ 2; 1028(a)(1); 1028(b)(1)(A)(ii)  
& 1028(c)(3)(A)]

THE GRAND JURY CHARGES:

**COUNT I - CRIMINAL CONSPIRACY**

On or about March 10, 2004, within the District of Guam, the defendant herein, YOUNG MIN KO, did willfully and knowingly combine, conspire, confederate and agree with Eun Young Lee and others, both known and unknown to the Grand Jury, to commit the offense of Fraud in Connection with Identification Documents, in violation of Title 18, United States Code, Section 1028(a)(1), and to aid, abet, counsel, command, induce and procure the conspiracy charged in this count and willfully cause others to perform acts and make statements in furtherance of the conspiracy, and did perform at least an overt act for the purpose of carrying out the conspiracy,

1 to-wit: the submission of an application for a Guam driver's license, said application bearing a  
2 false Taxpayer Identification Number (TIN) 936-72-6975,

3 ALL IN VIOLATION OF Title 18, United States Code, Sections 2 and 371.

4 **COUNT II - FRAUD IN CONNECTION WITH IDENTIFICATION DOCUMENT**

5 On or about March 10, 2004, in the District of Guam, the defendant herein, YOUNG  
6 MIN KO, did knowingly and without lawful authority produce an identification document,  
7 authentication feature and false identification document, to-wit: Guam driver's license number  
8 1228096843, by means of a false Internal Revenue Service Taxpayer Identification Number  
9 (TIN) 936-72-6975, and the production of said driver's license was in and affected interstate and  
10 foreign commerce.

11 ALL IN VIOLATION of Title 18, United States Code, Sections 2, 1028(a)(1),  
12 1028(b)(1)(A)(ii) and 1028(c)(3)(A).

13 DATED this 23<sup>rd</sup> day of January 2008.

14 A TRUE BILL.

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17  
18 LEONARDO M. RAPADAS  
19 United States Attorney  
20 Districts of Guam and NMI

REDACTED

21 By: Karon V. Johnson  
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24 Reviewed:

25 By: Jeffrey J. Strand  
26 JEFFREY J. STRAND  
27 First Assistant U.S. Attorney